

ALAMEDA COUNTY ENFORCEMENT WORKPLAN 2006/07 - November 1, 2006

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B. Compliance Monitoring

1. Comprehensive Inspection Plan
2. Investigative Response and Reporting Improvement
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Number – Use and Issuance

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County Resources

Alameda County is structured traditionally with a Deputy, Chief Deputy in this case, as program director and four full time Senior Agricultural Biologists dedicated to pesticide use enforcement (PUE). Two Senior Agricultural Biologists, assigned to the Livermore field station, work PUE approximately 35% of their time. Biologists assigned to other units are instructed to perform pesticide use monitoring inspections as they happen upon an application.

Inspections are tracked monthly by the PUE Deputy. Inspection goals are determined by previous years' work plan and totals.

A. Restricted Materials Permitting

Permit Evaluation-Process evaluation and improvement planning

Permit Evaluation

The Restricted Materials Permit (RMP) Program provides an abbreviated review procedure that serves as part of the functional equivalent to an environmental impact report which would normally be required by the California Environmental Quality Act (also known as CEQA).

Permit applicants are required to identify all known areas that could be adversely affected by the use of restricted materials. Growers and applicants are required to plan their needs in advance, consider the reduced use of restricted materials, alternatives, and other means of pest control, as well as promote dialogue with people who live and work near application sites before applying for their permits.

Biologists in Alameda County are responsible for knowing local conditions and using their knowledge in evaluating the permit application. The Biologists determines the appropriateness of whether or not to issue a RMP. The Biologist shall determine whether a substantial environmental impact may result from the use of any pesticide before issuing a permit and when evaluating the Notice of Intent (NOI). Only properly licensed and experienced biologists issue permits.

Additional considerations include:

- The necessity of the proposed application;
- Proximity of environmentally sensitive area(s);
- Mitigation measures necessary to minimize adverse environmental impact;
- Pesticide knowledge of the applicator;
- Qualified licensing of the applicant;
- Appropriate conditions or limitations of the pesticide(s); and
- Notice of Intent requirements for agricultural and non-agricultural use.

The permit evaluation process includes a review of the NOI for each proposed restricted material application. NOI's are reviewed by a biologist familiar with the proposed

application site. Alameda County policy limits RMP's to a period of 12 months or less. Seasonal permits expire on December 31 of the current calendar year.

Goal and Objective

Alameda County is primarily an urban county with many non-agricultural pesticide applications, primarily residential and landscape use. Agricultural use of restricted materials is primarily non-crop use by government agencies, golf courses, cemeteries, parks and other similar sites. In the tri-valley area of the county there is a thriving agricultural production industry which includes, but is not limited to, vineyards, olive orchards, and production nurseries. For each RMP applicant, the biologist determines if the individual is properly licensed or certified. In 2005/06 Alameda County developed a form titled "Application for Restricted Materials Permit" in order to improve and facilitate the permit evaluation process. It was introduced to a select group of permit holders as a trial run. This year, 2006/07, it will be included in the annual mailing to registrants and previous permit holders. Use of this form is optional, as the biologist assesses the need, and it is anticipated that it may improve the county's permit process by ensuring required information is complete, accessible, and available, especially with regards for new permit applications. It also ensure that the information provided by the applicant fulfills all requirements in order to issue a RMP and facilitate communication with the applicant. Other goals are:

- Evaluate of the need for each restricted material on application;
- Suggest alternatives, if known, during the application process;
- Review, evaluate, and approve or deny (with reason) the permit application;
- Process the application in a timely manner;
- Review, evaluate, and approve or deny (with reason) NOI's as they are submitted;
- Train biologists on mitigation measures and pesticide alternatives, if any.

Obtain additional training for biologists on mitigation measures and pesticide alternatives to the use of restricted materials.

Deliverables

- "Application for Restricted Materials Permit" form to be mailed for the 2007 season;
- Improve accuracy of the information on the restricted materials permit with the implementation of Restricted Materials Management System (RMMS) with Global Positioning System (GPS) capabilities;
- Improve dialogue and communication with permit applicants; and
- Expand and increase knowledge of biologists regarding pesticide alternatives, IPM, and pesticides updates.

Identifying previous and current holders of restricted materials permits in Alameda County is eliminated from this section because initially it was used to determine use trends of restricted materials. We determined that because of relatively low use of restricted materials it is no longer needed.

Measure Success

Perform an annual year-end evaluation of the permitting process for deficiencies. Evaluation would include review of issued permits, evaluating the reasons for permit and NOI denials, and any problems noted regarding the use of any restricted material. Discussions regarding the evaluation with licensed staff and Department of Pesticide Regulation (DPR) Enforcement Branch Liaison (EBL) will help in improving the permitting process for the next year.

Program Strengths

- Experienced PUE staff familiar with local area and can assess the need for restricted use pesticides
- PUE staff familiar with the needs of the regulated public

Program Areas Needing Improvement

- Begin the process of bring Global Information System (GIS) into our permit program to better identify proposed use sites
- On-going - evaluation of proposed applications to determine risk and suggest mitigation strategies
- Continuing needs - provide training to staff regarding alternatives to restricted use pesticides

Site Monitoring Plan

Biologists will review all NOI's submitted to determine whether:

- Location and type of application is on the permit;
- Permit conditions met;
- Environmental conditions considered;
- Permit applicant's history of compliance;
- Agricultural or non-agricultural application; and
- Pre-application site inspection warranted.

In all instances, the Biologist evaluates the material to be used and the location of any sensitive areas in proximity of proposed application site. Some of the primary considerations for assessing whether to conduct a pre-application site inspection and/or an application inspection are: the pesticide to be used, toxicity, proximity to sensitive crops and other sensitive sites (areas of environmental concerns e.g. watershed, waterways, endangered species habitat, schools), season, timing of application, whether the permit holder is known to Alameda County, and compliance history of the applicator/company.

Goal and Objective

Licensed staff will monitor permits as required. A minimum of 5% of sites identified in permits or NOI's will be monitored. Monitoring will include evaluating the basis for the

intended application, including written recommendations, toxicity of material, and areas of environmental concerns (e.g. endangered species, buffer zone areas, schools, ag-urban interface areas, groundwater/run-off sites). Alameda County will attempt to inspect all non-ag permits holders at least once a year. Permit holders with a record of non-compliance will be monitored more frequently.

Deliverables

Aerial applications, structural fumigations and commodity fumigations continue to be high priorities in Alameda County. Structural and commodity fumigations are closely monitored because of the high toxicity of the products used and proximity to occupied structures.

Additionally, our goal is to inspect 100% of non-agricultural permit holders once a year. This may not be possible due to application scheduling conflicts (e.g. one time applications on weekends).

In assessing the number of NOI's received by this county, consideration must be made of the fact that a proportionally large number of commodity fumigations occurs at a limited number of locations. These locations have been reviewed, permitted, work-site plans developed, and the site evaluated prior to any application occurring. Application inspections are conducted at these locations multiple times throughout the year.

Measure Success

Alameda County anticipates that improvement in the permit evaluation plan, the development of the application for RMP, thorough site monitoring, the implementation of RMMS, along with compliance monitoring inspections will result in greater compliance with our pesticide use regulations. Continuous evaluation and periodic review by staff and EBL will help to identify areas for improvement.

Program Strengths

- Staff familiar with local conditions and areas with regards to sensitive sites

Program Areas Needing Improvement

- Continuing - Schedule with EBL refresher training on Commodity Fumigation and related workplans
- Continuing - Schedule with EBL training on the requirements of workplan requirements when using phosphine products
- Begin process of bringing GIS into RMP program to better monitor map sites.

Private Applicator Certification

Scope: Pertaining to 3 CCR Section 6000: provides certification for individual use or supervision of pesticide use for production of an agricultural commodity on property owned, leased, or rented by an individual or employee or for the use or supervision of pest control on property privately owned, leased, or rented by a householder. This

certification allows for the use and possession of restricted materials (FAC Sec. 14015). The certificate is issued based on passage of an exam proctored by CAC.

Private applicator certification also qualifies an individual to provide pesticide training to employees, or fulfills employee training requirements for employees. Certification is restricted to property operators, employees or designated employees.

1. Prior to allowing an individual to take the Private Application Certification Test, the County Agricultural Commissioner (CAC) must determine if the person is qualified by matching their qualifications as defined in 3CCR Sec. 6000.
2. The individual fills out the proper DPR Private Applicator Certification and Renewal form (PR-ENF-045).
3. An appointment by the applicant is made with the Agricultural Biologist to provide the certification test. The test is given either at the grower's place of business or the CAC office in Livermore or Hayward.
4. The Agricultural Biologist proctors the exam while the individual takes the test. If necessary, the test can also be provided orally (but has not been done to date). The Biologist then scores the test. A Private Applicator Certificate (PAC) card is issued to the individual upon passing the test (70 percent or better). If the applicant is not successful, he is given the opportunity to retake the test after the seven day required period.
5. After passing the exam a RMP may also be issued if applicable (see Restricted Materials procedure).

The Biologist reviews with the private applicator requirements for monthly use reporting, record keeping, employee training (if applicable), inspection procedures, and PAC renewal (including continuing ed/retest) procedures and requirements. Compliance information and instructional materials as appropriate (PSIS, brochures, forms, etc) are also provided.

Operator Identification Number

Scope: Applies to the purchase and use of non-restricted pesticides for pest control in production (farms, rangeland, nurseries, etc.), non-production (golf courses, parks, cemeteries, right of ways, etc.) agricultural settings. The Operator Identification number (Op ID #) identifies the operator of property and site specific information. It does not apply to the use of restricted materials (CCR Sec. 6622.) or use of general pesticides in non-agricultural settings (e.g. residential or landscape maintenance for hire).

1. Grower contacts CAC to obtain information about application of pesticide(s) on their agricultural property or attempts to obtain pesticides from a wholesale/commercial source and is referred to CAC for a Op ID #.

2. CAC identifies applicability of Op ID# by obtaining the following information:

- What is the nature of the Agricultural Operation (production/non-production)?
- What is planted/will be planted on the property?
- What is the acreage?
- What pesticide will be applied?
- Is material in restricted or non-restricted use category?

If restricted material, follow protocol for restricted material issuance.

If non-restricted:

Is Op ID for rodent bait? Rule of thumb, property should be approximately 1 acre or more to qualify as a production site (as required by label registration requirements for Ag use).

Is Op ID for general use pesticide?

- if grower had Op ID issued before, renew Op ID with appropriate changes or updated contact/site information
- if grower is new, assign new Op ID number (following log sheet), get all the information needed for the database (including grid code/township Op ID from county map) and issue new Op ID No. for the year.

3. Review Op ID# and site information for accuracy. Review requirements for monthly use reporting, record keeping, employee training (if applicable), inspection procedures, and Op ID renewal. Provide compliance information and instructional materials as appropriate (Pesticide Safety Information Series, brochures, forms, etc.).

B. COMPLIANCE MONITORING

Introduction

The goal of our PUE Program is to attain compliance with pesticide law in Alameda County, and, in pursuit of that goal, to make the most effective use of our available budget and staff. The compliance-monitoring component of the Program serves two purposes: First, it identifies violations of law so that appropriate corrective action can be taken. Second, it identifies compliance problem areas, enabling us to redirect efforts to where they are needed. Compliance monitoring consists primarily of:

- Inspections and follow-up inspections;
- Investigations of pesticide-related injuries, illnesses, and complaints;
- Review of submitted pesticide-use reports.

Inspections

Licensed Biologists conduct scheduled as well as unscheduled (spontaneous) inspections in accordance with the standards set forth in the “Inspection Procedures Manual”, dated May 27, 2003, issued by the DPR. Inspection results, including any violations, are reported on forms provided by the DPR (Form numbers PR ENF-102 through PR ENF-110). The Biologists may issue a Violation Notice in response to a violation. It is usually the original Biologist who will perform any required follow-up inspection, and he/she will reference the original inspection on his/her follow-up report. Should violations be noted during an inspection, the Biologist will discuss with the PUE Deputy how the non-compliance fits the matrix as spelled out in the Enforcement Response Policy (ERP). Further enforcement action may be taken.

Alameda County conducts the following types of inspections:

- Pre-application site (for restricted materials);
- Fieldworker safety inspections;
- Pesticide use monitoring;
- Business Record audits;
- Headquarter and employee safety; and
- Pesticide storage site.

Inspections are conducted in the following types of settings:

- Production agriculture (e.g., vineyards, rangeland, research greenhouses);
- Non-production agriculture (e.g., cemeteries, golf courses, right-of-ways);
- Structural (e.g., Branch I structural fumigations, Branch II general pest control, and Branch III termite control);
- Industrial (e.g., food manufacturing plants);
- Shipping container yards (e.g., fumigations of export cargo, commodity fumigation);
- Residential (e.g., home landscaping, condominium common areas); and
- Institutional (e.g., schools).

We inspect the following persons and businesses:

- Any holder of a restricted materials permit;
- Growers;
- Pest control businesses;
- Public agencies (e.g., public works agencies, CALTRANS); and
- Cemeteries and golf courses.

Staff is instructed to perform unscheduled inspections of pesticide use at every opportunity-such as when a Biologist happens to drive by an in-progress pesticide

application. Unscheduled inspections are important for two reasons: First, we believe they are better than arranged inspections as indicators of actual compliance with pesticide law. Second, in contrast to record audits, for example—they occur in situations where there is potential for actual harm to persons, property, or the environment.

Our Biologists review monthly pesticide use reports submitted by pest control businesses and others. Missing or late reports prompt enforcement action. In addition, other compliance problems may be identified, such as restricted material violations, notification violations, and use of inappropriate pesticides. An inspector will advise his supervisor of these matters for possible enforcement actions.

Goals or Objectives

Alameda County's goal is to increase compliance with pesticide laws and regulations involving pesticide use within Alameda County. We are committed to a pro-active comprehensive compliance inspection program based on: our presence in the field; communication with growers, pest control businesses, and governmental agencies; and appropriate compliance and/or enforcement action when non-compliances are noted.

Deliverables

- Minimum of 200 headquarter/worker safety inspections annually;
- Minimum of 10 field worker safety inspections annually;
- Minimum of 35 mix/load inspections annually;
- Minimum of 200 application inspections annually;
- Minimum of 50 structural fumigation inspections annually;
- Minimum of 40 commodity fumigation inspections annually.

In 2006 Alameda County achieved the minimum number of inspections listed above. In one area we fell short – commodity fumigations. This was due to one of three companies quitting the commodity fumigation business and an increase in regulatory pressures by hazardous materials inspectors on the businesses.

Measures of Success

One measure of success is a decrease in the number of non-compliances. The effectiveness of our compliance activities can be increased by focusing and targeting inspections to address specific non-compliances. Another measure of success would be increase communication with pesticide applicators (e.g. request for training or participation in their employee training program, request for compliance assistance evaluation).

Program Strengths

- Experienced PUE staff familiar with both the California Food and Agriculture Code (CFAC) and the California Code of Regulations (CCR) and who can accurately assess compliance in the field and the office headquarters
- Employ an effective inspection strategy for conducting annually business and worker safety training records inspections

- Experienced PUE staff who has the local knowledge and are able to identify sensitive sites in their district

Program Areas Needing Improvement

- Work with EBL to schedule refresher training in conducting Field Worker Safety Inspections
- Ongoing - Schedule with EBL more oversight inspections (biologist to call with available dates)
- Ongoing - Schedule more frequent PUE meetings for sharing information
- Independent growers – with the fall of grape prices many small acreage growers have been left on their own to tend and harvest their crops. Some are unaware of their regulatory responsibilities. Biologists have identified these growers and have strategized a plan to assist these growers in achieving compliance. Compliance assistance inspections are scheduled.

Investigation Response and Reporting

Investigations

The Alameda CAC office is responsible for investigating all pesticide related incidences. These are brought to our attention by:

- Complaints from members of the public (e.g., complaint about a neighbor's activity);
- Complaints referred to us by another agency (e.g., Poison Control Center); or
- A "Doctor's First Report of Occupational Injury or Illness" referred to us by the Worker Health and Safety (WH&S) Branch of the DPR.

The goal is to determine whether the incident is, in fact, related to use of a pesticide, and, if possible, whether there occurred a violation of pesticide law.

We strive to begin an investigation within two days of its being received, and to complete it within forty-five days. The investigator gathers facts by interviewing witnesses, making observations at the site, reading product labels and other records, and perhaps taking environmental samples. The inspector submits a report to his supervisor stating, if possible, whether or not a violation occurred and what, if any, enforcement action he recommends. Once the supervisor approves the report, it is sent to the WH&S.

In some cases, we follow up our investigation simply by providing information about pesticide law to an employer. A typical case, might involve an employee's injuring an eye while using a disinfectant. We conclude the investigation by advising the employer of his obligations and informing him that he is subject to future inspection to verify compliance. In other cases, depending on the facts, enforcement action may be considered an appropriate response.

Investigations are important to our compliance-monitoring efforts for two reasons:

- The incidents often involve actual harm to persons, property, or the environment. In such cases, corrective action often is clearly indicated and is meaningful to the parties involved.
- Investigations bring our Department into contact with persons and businesses that we ordinarily would not interact with, thus increasing the scope of our Enforcement Program.

The procedures that are currently in place for illness/complaint investigations are as follows:

1. All complaints are reviewed by the PUE Deputy. After the review it is assigned to a district biologist for investigation.
2. The assigned biologist will then initiate contact with complainant and witnesses for an interview. Appointments will be made to provide adequate time to interview the parties. The Biologist will interview participants and interested witnesses confidentially.
3. After all the relevant information is gathered, the biologist will draft a report. The report will contain a brief summary of the incidence as well as a conclusion. When possible, the report always includes the suspect pesticide including brand names and EPA registration number.
4. The draft will be reviewed by the PUE Deputy. After all the corrections are made the report will then be signed by both the deputy and the investigating biologist.
5. A copy of the completed investigation report will be mailed to the DPR WH&S.
6. The original will be filed according to type of episode.

Goal or Objective

The goal of episode investigations is to gather data to evaluate pesticide use pattern, the effectiveness of the regulatory program, as well as determining appropriate enforcement action. As a result of the investigation process, an evaluation can be made concerning possible use violations, training needs, deficiencies in labeling, or required procedures.

Deliverables

Ongoing - The Alameda County Commissioners office responds and documents all complaints incidents that are pesticides related. The office conducts investigations in a timely manner. Most pesticide episode investigation reports are submitted within 120 calendar days as required by DPR. The following are areas in which the county should focus effort in improving investigative response and reports:

1. Reducing initiation and completion times. This will result in improved evidence gathering. EBL aids in monitoring progress of investigations with timely reminders.

2. Developing and use of investigative plans. This plan is used to reduce the time needed to obtain key evidence and complete the investigative report.
3. Monthly meetings to update and discuss investigations.
4. Complete report preparation, that includes all suspected and casual violation discovered during the investigation.
5. Continued training of staff to improve their investigation and reporting skills.
5. Keep complaint log for EBL review.

Measure of Success

Success can be measured by the results of our yearly evaluation of our investigation and response reporting. Periodic meeting with staff and EBL to discuss any deficiencies or improvements can be the genesis to develop a plan of action to address any weaknesses in our program. The number of returned or incomplete investigations will also indicate the level of success of our program.

Program Strengths

- Ongoing - Document and respond to all pesticide complaints and reported illnesses;
- Ongoing - Initiate investigations in a timely manner;
- Ongoing - Complete investigations in a timely manner;
- New email notification system from Poison Control Center which will enable CAC to begin investigations closer to the date of occurrence resulting in better accuracy and more timely completions.

Program Areas Needing Improvement

- Schedule refresher training with EBL on Pesticide Episode Investigation and Investigative Sampling Techniques. "Investigative Sampling Training" was presented by DPR in Sonoma County in June 2006;
- Review criteria that triggers priority investigations;
- Develop and/or improve existing templates for basic investigation reports;
- Keep Monthly illness/complaint log for EBL
- Ensure that illness investigations are submitted on time or that an extension is requested.

C. Enforcement Response Evaluation

Non-compliances are identified through our normal pesticide program of inspections and investigations. Should non-compliances be noted, the inspecting biologist reviews past inspections, history of the company, response or lack of by the company or person, and applies the directives of the ERP. If applicable and reasonable a Decision Report is written explaining why further enforcement action was not taken, otherwise a Notice of Proposed Action (NOPA) is developed. The Decision Report is reviewed by the Deputy and either accepted or, if not, revises the action to be taken according to all available evidence.

The ERP matrix is considered when making decisions as to what kind of action to take and at what level.

If a Decision Report is issued, non-compliances are followed up either with a violation notice or warning letter, and a follow-up inspection is scheduled. When deemed necessary, either due to the seriousness of the violation or the history of the company, stronger action may be taken through a Compliance Interview, Civil Penalty Action, referral to the DPR or the California Structural Pest Control Board for licensing action, or referral to the District Attorney's Office.

Compliance Action –

Inspections

Any non-compliance noted on an inspection form may be handled by communicating directly with the applicator, their supervisor, and/or the owner of the company. They should discuss the nature of the non-compliance and the course of action to correct the problem.

Warning Letters or Violation Notice

Which form to use is at the discretion of the Biologist/Deputy. When possible, the letter/notice is hand delivered to the offender at which time the Biologist has the opportunity to discuss the preventative course of action that the offender will take for the future.

Compliance Interview

When stronger action is needed to gain compliance, a documented compliance interview may be conducted. The offender is given a date and time to appear in our office in order to explain the violations that occurred and to hear what remedies will be taken to prevent further problems. The Sections that were violated are listed and the offender signs a form stating that he understands the need to prevent further violations.

Enforcement Action –

Civil Penalty Actions

Examples of non-compliances that would indicate a need for a civil penalty action on the first violation would include violations which jeopardize the safety/health of employees, the environment or others, failure of a licensed pesticide user to obtain permits, register in a county, report use, etc. Violations which cause actual human death or serious illness, or substantial environmental or property damage will be considered for other civil, criminal or administrative actions on the first violation.

The fine level for Civil Penalty actions will be in compliance with CCR Section 6130 for agricultural violations or Division 16 or Section 1922 of the Business Profession Code of the Structural Pest Control Section for structural violations. The facts of each situation

must be applied logically to determine which Class a violation would fall into and at what level within each Class.

A NOPA is mailed to the respondent via Certified mail. The respondent has three options:

1. Sign and return the Order/Stipulation and Waiver Order to Alameda County with appropriate payment or fine. No appeal of the Proposed Action.
2. Respondent requests a hearing. They have a right to review and present evidence to a Hearing Officer. The hearing Officer writes a Notice of Decision which may be appealed. If not appealed, the respondent pays the fine. If appealed, the respondent submits a written request within 10 days of receiving the Commissioner's decision. The Director hears oral or written arguments and gives a written decision (within 45 days if written argument or 15 days if oral argument) to the Commissioner and the Respondent. There are still appeal rights through the judicial system.
3. The respondent requests a hearing but fails to appear. A Notice of Decision is rendered by the Hearing Officer. The respondent has no appeal right after the Notice of Decision and must abide by the Hearing Officer's decision (pay fine).

Referral to DPR or the Structural Pest Control Board (SPCB)

The CAC has the option of referring cases to DPR or SPCB for licensing action, if the violation is severe enough to warrant such action.

Referral to the District Attorney's Office

The CAC has the option of referring cases to District Attorney's Office for civil or criminal action, if the violation is severe enough to warrant such action.

Goals and Objectives

To achieve compliance and have equitable enforcement of the laws and regulations that pertain to the use of pesticides in Alameda County. To ensure that all parties involved are provided with basic due process rights.

Deliverables

The biologist takes into consideration all possible forms of enforcement as described above. A calendar is displayed in the duty biologist area to list important dates for pending actions, as well as a log noting the case number; company name; date of the NOPA; date of Stipulation, or date of hearing request; and date of the Notice of Decision (or withdrawal). Confer with EBL as to appropriate course of action for Class A, and possibly Class B, violations.

Measure Success

Success can be measured by the compliance history following a compliance or enforcement action. Success may also be measured by the compliance of others not directly involved by our enforcement response (e.g. word-of-mouth). Emphasis will be on identifying, monitoring and deterring “repeat” violators through both compliance monitoring and proper enforcement response.

Program Strengths

- Thorough investigative report, including an outline of the “elements of a violation”, to serve as the foundation for ACP/SCP, should the action be warranted
- Strict use of the ERP;
- Good communication between Biologists, Deputy, and EBL;
- Flow-chart/Matrix developed to clearly explain ERP to Biologist and regulated public.

Program Areas Needing Improvement

- Improve timeliness in decision making process of when to use ACP/SCP;
- Provide more training in case preparation, including witness preparation, advocate skills, and evidence presentation;
- Confer more often with EBL when considering cases, especially Class A and/or B;
- Confer with District Attorney’s Office when Class A violations are identified;
- Dove-tailing in-house county policy with ERP;
- Develop templates for Decision Reports to ensure that all applicable areas are addressed.